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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: APR 21 1987

SUBJECT: Request for Removal Action at the Dead Creek Area G Site,
Sauget, Illinois (Site Spill ID # 8E) - ACTION MEMORANDUM

FROM: Sherry A. Kamke, On-Scene Coordinator.
Emergency Response Section

TO: Valdas V. Adamkus
Regional Administrator

THRU: Basil G. Constantelos, Director
Waste Management Division

PURPOSE

The purpose of this action memorandum is to obtain your approval to expend up to \$617,800.00 in order to mitigate an imminent and substantial threat to public health, welfare, and the environment from hazardous materials in soils at the Dead Creek Area G site in Sauget, Illinois. The proposed action seeks to abate future public exposure by fencing the site and covering with soil. The project will require an estimated 54 working days to complete.

BACKGROUND

The Illinois Environmental Protection Agency (IEPA), using State funds, is presently conducting a remedial investigation/feasibility study for the Dead Creek area to generate data for adding sites to the National Priorities List. During the course of this investigation, soil samples from the locale designated as Area G revealed levels of contaminants that are among the highest encountered in the State of Illinois. These contaminants include polychlorinated biphenyls (PCBs), pentachlorophenol (PCP), and octachlorodibenzo-dioxin.

The site is not presently on the National Priorities List (NPL), but is presently being evaluated by the State for listing.

THREATS

On March 4, 1987, the United States Environmental Protection Agency (U.S. EPA) and the Technical Assistance Team (TAT) conducted a site assessment at the Dead Creek Area G location. The site was found to be immediately south of Queeny Avenue west of Dead Creek, north of an agricultural field and east of a local engineering company. The site is fenced along Dead Creek. A residential area is located about 1/2 mile south of the site.

Analyses of the surficial soils by the IEPA's contractor reveal levels of PCP at concentrations as high as 0.14 percent, PCBs as high as 7.4 percent and octachlorodibenzo-dioxin as high as 130 mg/kg. Other contaminants include tetrachloroethene and 4,4'-DDE. Numerous 55-gallon drums project through the surface in several different areas.

IEPA's contractor intends to perform air monitoring at this site which IEPA believes to be critical to the Hazard Ranking System (HRS) score for the site.

Based on this site assessment and available information on the site, it is evident that this site poses a significant threat to human health and the environment, and meets the criteria set forth in Section 300.65 (b)(2) of the National Contingency Plan (NCP) for a removal action, specifically:

- 1) Actual or potential exposure to hazardous substances or pollutants or contaminants by nearby populations, animals, or food chain;
- 2) Hazardous substances, pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers that pose a threat of release;
- 3) High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate;
- 4) Weather conditions that may cause hazardous substances, pollutants or contaminants to migrate or be released.

ENFORCEMENT

See the enforcement confidential attachment (Attachment I) for this information.

PROPOSED ACTION AND COST

The IEPA has requested that any removal action not be detrimental to the data gathering required for the HRS scoring package. IEPA considers it to be vital that the surface of Area G not be disturbed prior to air monitoring. Therefore, the removal action should take place in two phases.

Phase one will consist of fencing the remaining three sides of this approximately 700 x 500 feet site. This will prevent direct public access while causing minimal disturbance to the soil.

Phase two would consist of covering the site with a plastic liner and 1 foot of clean soil to minimize any volatilization of contaminants into the atmosphere. The need for phase two will be evaluated after receiving the results of IEPA's air monitoring.

The estimated costs for the project are as follows:

EXTRAMURAL COSTS

ERCS	\$481,209.36
TAT	27,000.00
Subtotal	508,209.36
Contingency (15%)	76,231.40
Total Extramural	\$584,440.76

INTRAMURAL COSTS

EPA Direct	\$ 12,960.00
EPA Indirect	20,400.00
Total Intramural	33,360.00
Project Total	\$617,800.76
	(\$617,800.00)

A more detailed cost estimate is given in Attachment II.

RECOMMENDATION

Because conditions at the Dead Creek Area G site meet the NCP §300.65 (b)(2) criteria for removal, I recommend your approval of the proposed removal action in order to expedite response actions due to the nature of the threat. The estimated total project costs are \$617,800.00, of which \$584,440.00 are extramural costs.

APPROVAL:


REGIONAL ADMINISTRATOR

DATE:

5/01/87

DISAPPROVAL:

REGIONAL ADMINISTRATOR

DATE:

Attachments (2)


5/1/87

ATTACHMENT 1

ENFORCEMENT ADDENDUM

**DEAD CREEK AREA G SITE
SAUGET, ILLINOIS
MAY 1, 1987**

**ENFORCEMENT CONFIDENTIAL
NOT SUBJECT TO DISCOVERY**

**HAS BEEN REDACTED
(1 PAGE)**

NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION

ATTACHMENT II
Detailed Cost Estimate

Fencing (5 day estimate)

Extramural Costs	
ERCS personnel	\$ 3,250.75
ERCS equipment	275.00
ERCS subcontractor	18,952.00
TAT costs	<u>2,500.00</u>
Subtotal	\$ 24,977.75
Contingency (15%)	<u>3,746.66</u>
Total Extramural Costs	\$ 28,724.41
Intramural Costs	
EPA Direct	\$ 1,200.00
EPA Indirect	<u>2,400.00</u>
Total Intramural Costs	\$ <u>3,600.00</u>
Total Fencing Costs	\$ 32,324.41

Capping (49 day estimate)

Extramural Costs	
ERCS personnel	\$ 86,109.35
ERCS equipment	68,935.00
ERCS subcontractor	303,687.26
TAT costs	<u>24,500.00</u>
Subtotal	\$483,231.61
Contingency (15%)	<u>72,484.74</u>
Total Extramural Costs	\$555,716.35
Intramural Costs	
EPA Direct	\$ 11,760.00
EPA Indirect	<u>18,000.00</u>
Total Intramural Costs	\$ 29,760.00
Total Capping Costs	\$585,476.35
Total Project Cost	\$617,800.76
	(\$617,800.00)